



8517 Excelsior Drive  
Suite 301  
Madison, WI 53717

Phone: 608.664.9110  
Fax: 608.664.9112  
www.kiesling.com

REDACTED – FOR PUBLIC INSPECTION

June 29, 2015

Received & Inspected

JUN 30 2015

FCC Mailroom

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Grafton Telephone Company (SAC 341020)**

Dear Ms. Dortch:

On behalf of **Grafton Telephone Company**, Kiesling Associates LLP files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> **Grafton Telephone Company** seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, an attached letter requests confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions about this filing to the undersigned at 608-664-9110 or [rabrams@kiesling.com](mailto:rabrams@kiesling.com).

Sincerely,

KIESLING ASSOCIATES LLP

Robert R. Abrams  
Senior Telecommunications Consultant

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)  
Office of the Chief Clerk, Illinois Commerce Commission

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

No. of Copies rec'd 0+1  
List ABCDE



8517 Excelsior Drive  
Suite 301  
Madison, WI 53717

Phone: 608.664.9110  
Fax: 608.664.9112  
www.kiesling.com

**Received & Inspected**

**REDACTED – FOR PUBLIC INSPECTION**

**JUN 30 2015**

**FCC Mailroom**

June 29, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**Re: WC Docket 14-58  
2015 ETC Annual Report of Grafton Telephone Company (SAC 341020)  
Request for Confidentiality**

Dear Ms. Dortch:

On behalf of **Grafton Telephone Company** (the “Company”), Kiesling associates LLP hereby requests withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement, pursuant to Sections 0.457 and 0.459 of the Commission’s rules.<sup>1</sup> The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is the attachment at Line 112 of the Company’s annual reporting information in FCC Form 481, pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan (“Progress Report”) which is contained in the attachment to the 2015 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan, as provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.
4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company’s network.

<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> 47 C.F.R. §§ 54.313(a)(1).



**REDACTED – FOR PUBLIC INSPECTION**

In its *March 5, 2013 Order*, the FCC specified that for rate-of-return carriers, the five-year plans “should describe the carrier’s network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories.”<sup>5</sup> The Company is a rate-of-return carrier filing its five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company’s existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company’s existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company’s serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to existing and potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company’s customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

---

<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) (“*March 5, 2013 Order*”) at para. 9 citing Section 54.202(a) (1) (ii).

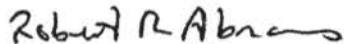
**REDACTED – FOR PUBLIC INSPECTION**

Based on the preceding, Kiesling respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned at 608-664-9110 or [rabrams@kiesling.com](mailto:rabrams@kiesling.com) with questions regarding this request.

Sincerely,

KIESLING ASSOCIATES LLP



Robert R. Abrams  
Senior Telecommunications Consultant

cc: Office of the Chief Clerk, Illinois Commerce Commission

<b>FCC Form 481 - Carrier Annual Reporting</b> <b>Data Collection Form</b>	<b>REDACTED - FOR PUBLIC INSPECTION</b> <small>FCC Form 481          OMB Control No. 3060-0086/OMB Control No. 3060-0619          July 2013</small>
---	--

<010> Study Area Code	341020
<015> Study Area Name	GRAPTON TEL CO
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Leigh Sickinger
<035> Contact Telephone Number: Number of the person identified in data line <030>	6187863400 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	lsickinger@gtec.net

Received &amp; Inspected

JUN 30 2015

FCC Mailroom

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	54.313 Completion Required	54.422 Completion Required
--	----------------------------------	----------------------------------

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 34102011510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 34102011610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>



<b>(100) Service Quality Improvement Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	341020
<015> Study Area Name	GRAFTON TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035> Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<110> Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111> If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

341020i1112.pdf

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

[illegible]

OMB Control No. 3060-0985/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	341020
<015>	Study Area Name	GRAPTON TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@atcc.net

<701> Residential Local Service Charge Effective Date  
<702> Single State-wide Residential Local Service Charge

1/1/2015

<703>

[illegible]



(710) Broadband Price Offerings Data Collection Form FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

[illegible]

## Page 6

[800] Operating Companies  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtcc.net
<810>	Reporting Carrier	Grafton Telephone Company
<811>	Holding Company	Grafton Communications, Inc.
<812>	Operating Company	Grafton Telephone Company

[illegible]

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	341020
<015>	Study Area Name	GRAPTON TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable



<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010> Study Area Code	341020
<015> Study Area Name	GRAFTON TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035> Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b>		FCC Form 481
<b>Lifeline</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<b>Data Collection Form</b>		July 2013

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@qtec.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |  |                                     |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

<b>(2000) Price Cap Carrier Additional Documentation</b> <b>Data Collection Form</b> <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	341020
<015> Study Area Name	GRAPTON TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Laign Sickinger
<035> Contact Telephone Number - Number of person identified in data line <030>	6167863400 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}  
 <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}  
 <2011b> Attachment {47 CFR § 54.313(b)(1)iii}

Name of Attached Document(s) Listing Required Information

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}  
 <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}  
 <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}  
 <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

- <2016> Certification Support Used to Build Broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

- <2017> 3rd year Broadband Service Certification  
 <2018> 5th year Broadband Service Certification  
 <2019> Interim Progress Certification  
 <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information



(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0966/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	341020
<015> Study Area Name	GRAFTON TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035> Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtcc.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

341020113010.pdf

(3010) Progress Report on 5 Year Plan  
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☒

341020113012.pdf

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))  
(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ ☒  
(Yes/No) ☒ ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☐

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited?

(Yes/No) ☒ ☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit ☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☒

(3023) Underlying information subjected to a review by an independent certified public accountant ☒

(3024) Underlying information subjected to an officer certification. ☒

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

341020113026.pdf

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation (Continued)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	341020
<015> Study Area Name	GRAFTON TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035> Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtcc.net

Financial Data Summary

(3027) Revenue

REDACTED

(3028) Operating Expenses

REDACTED

(3029) Net Income

REDACTED

(3030) Telephone Plant In Service(TPIS)

REDACTED

(3031) Total Assets

REDACTED

(3032) Total Debt

REDACTED

(3033) Total Equity

REDACTED

(3034) Dividends

REDACTED

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	341020
<015> Study Area Name	GRAPTON TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035> Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	341020
<015> Study Area Name	GRAPTON TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035> Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Kiesling Associates LLP</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Kiesling Associates LLP
Name of Reporting Carrier:	GRAPTON TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/29/2015
Printed name of Authorized Officer:	Leigh Sickinger
Title or position of Authorized Officer:	Vice President
Telephone number of Authorized Officer:	6187863400 ext.
Study Area Code of Reporting Carrier:	341020 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	GRAPTON TEL CO
Name of Authorized Agent or Employee of Agent:	Kiesling Associates LLP
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/29/2015
Printed name of Authorized Agent or Employee of Agent:	Robert R. Abrams
Title or position of Authorized Agent or Employee of Agent:	Communications Consultant
Telephone number of Authorized Agent or Employee of Agent:	6086649110 ext.243
Study Area Code of Reporting Carrier:	341020 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED - FOR PUBLIC INSPECTION

Attachments

**REDACTED - FOR PUBLIC INSPECTION**

**REDACTED – FOR PUBLIC INSPECTION**

**GRAFTON TELEPHONE COMPANY (SAC 341020)**

**ATTACHMENT - LINE 112**

**FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN**

**ATTACHMENT REDACTED IN ENTIRETY**



**FCC Form 481 – Line 510 Service Quality Standards & Consumer Protection Compliance**

**SAC:** 341020  
**State:** IL  
**Name:** Grafton Telephone Company  
**Submission:** 7/1/2015

47 CFR §54.313(a)(5) requires an ETC to certify that it complies with applicable service quality standards and consumer protection rules.

Grafton Telephone Company complies with applicable service quality standards for local exchange telecommunications carriers in Title 83 the Illinois Administrative Code (*ILGA §730, Subpart E*) which includes adequacy of service, answer time, service interruptions, outages and notifications.

Grafton Telephone Company complies with consumer protection requirements including those found in federal Customer Proprietary Network Information (*CPNI; WC Docket No. 04-36*), and those of the Title 83 the Illinois Administrative Code (*ILGA §732*), covering local exchange service obligations, payment and billing practices, procedures for timely reimbursement of customer credits, customer education programs, and (*ILGA §755*) meeting state requirements regarding telecommunications access for persons with disabilities.

Grafton Telephone Company certifies it has complied with these requirements and will continue to comply with these requirements.



REDACTED - FOR PUBLIC INSPECTION  
State of Illinois

**Illinois Commerce Commission**  
**Service Quality for Telecommunications Carriers**  
**Code Part 730.115**  
**Quarterly Filing**

**Grafton Telephone Company**  
**for quarter ending December 31, 2014**

Performance Data	October	November	December	Quarterly Average
A. Operator Answering Time - Toll and Assistance [730.510(a)(1)]	3.10	3.00	3.90	3.33
B. Operator Answer Time - Information [730.510(a)(1)]	5.03	4.79	6.18	5.33
C. Repair Office Answer Time [730.510(b)(1)]	4.00	4.50	4.00	4.17
D. Business or Customer Service Answer Time [730.510(b)(1)]	4.00	4.50	4.00	4.17
E. Percent of Service Installations [730.540(a)]	100.00%	100.00%	100.00%	100.00%
F. Percent of Out of Service Lines Repaired in < 30 Hours [730.535(a)]	100.00%	100.00%	100.00%	100.00%
G. Trouble Reports per 100 Access Lines [ 730.545(a)]	1.88	0.25	1.27	1.13
H. Percent Repeat Trouble Reports [730.545(c)]	13.33%	0.00%	10.00%	7.77%
I. Percent of Installation Trouble Reports [730.545(f)]	0.00%	0.00%	0.00%	0.00%
J. Missed Repair Appointments [730.545(h)]	0	0	0	0
K. Missed Installation Appointments [730.540(d)]	0	0	0	0

Comments



REDACTED - FOR PUBLIC INSPECTION  
State of Illinois

**Illinois Commerce Commission**  
**Customer Credits for Telecommunications Carriers**  
**Code Part 732.30**  
**Quarterly Filing**

**Grafton Telephone Company**  
**for quarter ending December 31, 2014**

<b>Out of Service More Than 30 Hours</b>	<b>October</b>	<b>November</b>	<b>December</b>	<b>Totals</b>
A. Total dollar amount of all customer credits paid	\$0.00	\$0.00	\$0.00	\$0.00
B. Number of credits issued for repairs - 30 - 48 hours	0	0	0	0
C. Number of credits issued for repairs - 48 - 72 hours	0	0	0	0
D. Number of credits issued for repairs - 72 - 96 hours	0	0	0	0
E. Number of credits issued for repairs - 96 - 120 hours	0	0	0	0
F. Number of credits issued for repairs > 120 hours	0	0	0	0
G. Number of exemptions claimed for each of the categories identified in Section 732.30(e)	0	0	0	0
H. Number of customers receiving alternate phone service rather than receiving a credit	0	0	0	0

<b>Failure to Install Basic Local Exchange Service</b>	<b>October</b>	<b>November</b>	<b>December</b>	<b>Totals</b>
A. Total dollar amount of all customer credits paid	\$0.00	\$0.00	\$0.00	\$0.00
B. Number of installations after 5 business days	0	0	0	0
C. Number of installations after 10 business days	0	0	0	0
D. Number of installations after 11 business days	0	0	0	0
E. Number of exemptions claimed for each of the categories identified in Section 732.30(e)	0	0	0	0
F. Number of customers receiving alternate phone service rather than receiving a credit	0	0	0	0

<b>Missed Appointments</b>	<b>October</b>	<b>November</b>	<b>December</b>	<b>Totals</b>
A. Total dollar amount of all customer credits paid	\$0.00	\$0.00	\$0.00	\$0.00
B. Number of customers receiving credits	0	0	0	0
C. Number of exemptions claimed for each of the categories identified in Section 732.30(e)	0	0	0	0

**Comments**



**FCC Form 481 – Line 610 Ability To Remain Functional In An Emergency Situation**

**SAC:** 341020  
**State:** IL  
**Name:** Grafton Telephone Company  
**Submission:** 7/1/2015

47 CFR §54.313(a)(6) requires an ETC to certify that it is able to function in emergency situation as set forth in 47 CFR §54.202 (a)(2).

Grafton Telephone Company complies with relevant sections for wireless ETCs in Title 83 the Illinois Administrative Code (*ILGA §730, Subpart C*) requiring it to make provisions to meet emergencies resulting from failures of commercial or power service, sudden and prolonged increases in traffic, illness of personnel, fire, storm, or other natural disasters. The company informs employees as to procedures to be followed in the event of emergency in order to prevent or minimize interruption or impairment of telecommunications service, and maintains an adequate number of hours of reserve battery power.

Central Office batteries are maintained in accordance with Institute of Electrical and Electronic Engineers (IEEE) standards as adopted in Section 730.340, and generators are tested each week.

Designated employees are informed as to procedures to be followed in the event of an emergency in order to prevent or mitigate interruption or impairment of telecommunications service, including rerouting of traffic around damaged facilities and the deployment of emergency power.

Grafton Telephone Company certifies it has complied with, and will continue to comply with applicable requirements regarding its ability to remain functional in an emergency situation as set forth in 47 CFR §54.202 (a)(2).



341020il610.pdf

Emergency Plan

Grafton Telephone Company

---

*AC POWER OUTAGES*

1. Contact Power Company at Ameren CIPS
2. If outage is during after hours contact: Ameren
3. Fixed Generator is located 119 East Main Street & 1250 Grafton Hill Drive
4. Portable Generator is located at 19942 Powerline Road (M. Arnold)
5. Follow 911 Outage Procedure

# 341020il610.pdf

Emergency Plan

Grafton Telephone Company

## EMERGENCY COORDINATING CENTER (ECC)

### GENERAL RESPONSIBILITIES:

In the event of a major emergency or disaster, the established "Outage Restoral Procedures" will be followed:

### OUTAGE RESTORAL PROCEDURE

1. Contact the Dispatch Center at 618-786-3311 or After Hours 618-786-2300
  - a. The Dispatch Center will follow their procedures in notifying the Dispatch Supervisor, I & R Supervisor, Central Office Supervisor, Central Office Technician and Network Reliability
2. Contact 911 Coordinators –
  - a. Jersey County 911 – 618-498-5571
  - b. Jersey County Sheriff – 618-498-6881
  - c. QEM Fire Department – 618-786-3300
  - d. Jerseyville Police Department – 618-498-2131
3. Contact Home Telephone Company (618-644-2111), Alhambra & Grantfork Telephone Company (618-488-2165), Madison Telephone Company (618-635-3214), if needed.
4. Contact Switch Vendor: Genband –1-866-436-2263 –  
Express Routing Code: 1036; Support Access ID 3898315

Dispatch for all possible personnel and equipment needed. It is better to have too much equipment and personnel on site than to require additional support later, which could lengthen the duration of the outage.

**REDACTED - FOR PUBLIC INSPECTION**

(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	341020
<015>	Study Area Name	GRAPTON TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtc.net

<701> Residential Local Service Charge Effective Date  
<702> Single State-wide Residential Local Service Charge

1/1/2015

<703>

[illegible]

**REDACTED - FOR PUBLIC INSPECTION**

(710) Broadband Price Offerings  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 341020

<015>	Study Area Name	GRAFTON TEL CO
-------	-----------------	----------------

<020>	Program Year	2016
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
-------	---	-----------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
-------	---	-----------------

<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net
-------	---	---------------------

[illegible]



**REDACTED - FOR PUBLIC INSPECTION**

(800) Operating Companies  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	341020
<015>	Study Area Name	GRAFTON TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Leigh Sickinger
<035>	Contact Telephone Number - Number of person identified in data line <030>	6187863400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lsickinger@gtec.net
<810>	Reporting Carrier	Grafton Telephone Company
<811>	Holding Company	Grafton Communications, Inc.
<812>	Operating Company	Grafton Telephone Company

[illegible]

**FCC Form 481 – Line 1210 Lifeline Service Terms & Conditions**

**SAC:** 341020  
**State:** IL  
**Name:** Grafton Telephone Company  
**Submission:** 7/1/2015

Grafton Telephone Company offers Lifeline service to qualifying subscribers.

- Qualifying residential subscribers receive a monthly Lifeline credit of \$9.25 (via the federal Low Income program), against the regular \$21.50 monthly service rate. This benefit is limited to one per qualifying household unit, and for service received from a single provider.
- Number of Local Minutes/Calls Provided: Unlimited local calling.
- Additional Charges for Toll Calls: Toll calls and services for Lifeline subscribers are available and are billed at toll carriers' standard rates.
- No monthly or non-recurring charges for toll blocking features for qualified Lifeline subscribers.
- Federal program eligibility for Lifeline service must be confirmed before the credit is issued. All subscribers must be recertified at least once each year.

Lifeline eligibility requires that income be no higher than 135% of the federal Poverty Guideline level, and/or participation in at one of the following programs, verified at least once each year:

- Supplemental Security Income (SSI)
- Supplemental Nutritional Assistance Programs (SNAP) – Food Stamps
- Low Income Home Energy Assistance Program (LIHEAP)
- Temporary Assistance for Needy Families (TANF)
- Federal Public Housing Assistance (FPHA)/Section 8
- National School Lunch – Free Lunch Program
- Head Start (if income eligibility criteria are met)

The Company's Lifeline brochure and Illinois Universal Telephone Assistance Programs (UTSAP) tariff with Terms and Conditions for these programs are attached.

Grafton Lifeline Brochure



## Do you need Local Phone Service, but can't afford it?

You may be eligible for greatly reduced local phone line installation and a credit each month to lower the cost of your local phone service.



The Link-Up and Lifeline programs provide these benefits to eligible individuals and families.

You're eligible for the Link-Up and Lifeline programs if you participate in any of the following programs:

- Medicaid
- Food Stamps
- Temporary Assistance to Needy Families (TANF)
- Low Income Home Energy Assistance (LIHEAP)
- Supplemental Security Income (SSI)
- Free National School Lunch Program
- Federal Public Housing

To determine your eligibility for Link-Up and Lifeline and to enroll in these programs,

Grafton Telephone Company  
119 E. Main St.  
Grafton, IL 62037  
(618)786-3311

All others: Call your local telephone company

# Lifeline Link-Up

UNIVERSAL TELEPHONE ASSISTANCE PROGRAMS

*These programs are supported by voluntary contributions. Contributions can be made through monthly donations of between 50 cents and \$5 on local phone bills or by sending contributions to UTAAC, P.O. Box 1176, Springfield, IL 62705.*

*Contributions are deductible on income taxes to the extent allowed by law.*

A Message from the Universal Telephone Assistance Corporation  
P.O. Box 1176, Springfield, Illinois 62705

Grafton UTSAP/Lifeline Tariff Page

Grafton Telephone Company

Section 15  
3<sup>rd</sup> Revised Sheet No. 1.1  
Cancels 2<sup>nd</sup> Revised Sheet No. 1.1

TELEPHONE ASSISTANCE PROGRAMS

15. Telephone Assistance Programs (Cont'd.)

15.2 Universal Telephone Service Assistance Program (UTSAP)

A. General

1. A one-time credit of up to \$20.00, not to exceed 50% of the total connection charge, will be applied to the telephone installation charge for each eligible subscriber or eligible new subscriber, as defined in B.2 below. (T)
2. To qualify for the program, the applicant must participate in any of the following assistance programs, as required, to establish eligibility. The Illinois Department of Human Services will certify the applicant's participation in assistance programs (a) and (b) below for purposes of determining eligibility: (T)
  - a. Medicaid
  - b. Supplemental Nutrition Assistance Program (SNAP) – formerly Food Stamps (T)
  - c. Supplemental Security Income (SSI)
  - d. Federal Housing Assistance Program
  - e. Low Income Home Energy Assistance (LIHEAP)
  - f. National School Lunch Program's free lunch program
  - g. Temporary Assistance to Needy Families (TANF)
3. The Telephone Company's verification form signed by the applicant or verification through the Department of Human Services shall constitute proof of income eligibility. (C)
4. Assistance shall be granted to one access line per low income household. (T)
5. The UTSAP Program is funded through voluntary contributions from Illinois customers as described in 15.3 following. (T)

LIFELINE SERVICES

Customer's with Lifeline Service have unlimited local calling and have access to all long distance company's interexchange carriers) calling plans.

**RECEIVED**

SEP 24 2013

CHIEF CLERK'S OFFICE  
Illinois Commerce Commission

Issued: 09/24/13

Mike Arnold  
V.P./General Manager  
Grafton, IL 62037

Effective: 09/25/13



**FCC Form 481 – Line 3010 – Milestone Certification, 47 CFR §54.313(f)(1)(i)**

**SAC:** 341020  
**State:** IL  
**Name:** Grafton Telephone Company  
**Submission:** 7/1/2015

Grafton Telephone Company hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

**FCC Form 481 – Line 3012 – List of Community Anchor Institutions to Which the ETC  
Newly Began Providing Service, 47 CFR §54.313(f)(1)(ii)**

**SAC:** 341020  
**State:** IL  
**Name:** Grafton Telephone Company  
**Submission:** 7/1/2015

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service in the previous year.

The FCC has defined community anchor institutions in Section 54.5 of its Rules as "schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities."

In addition to existing served subscribers, the Company did not newly begin providing access to broadband service to any community anchor institutions during calendar year 2014.

REDACTED - FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION  
GRAFTON TELEPHONE COMPANY (SAC 341020)  
ATTACHMENT - LINE 3026  
ATTACHMENT REDACTED IN ENTIRETY